

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 25-cv-61422-Augustin-Birch

[Consent Case]

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

_____ /

JOINT MOTION FOR ENLARGEMENT OF TIME

Plaintiff MELINDA MICHAELS, and Defendants SEAWATER PRO LLC and MICHAEL SPANOS A/K/A MIKE SPANOS, through their undersigned counsel and pursuant to the Court's Order on Notice of Settlement [ECF No. 84] ("Order"), respectfully requests an enlargement of time fourteen days, through November 6, 2025, to submit the documents required by the Order and in support Plaintiff states the following:

Counsel have been cooperating in exchanging revisions on the final written Settlement Agreement but need additional time. While the parties continue to work towards a final written Settlement Agreement, this endeavor has been more complicated than anticipated due to matters beyond the control of the parties and counsel who represents them in this litigation.

Federal Rule of Civil Procedure 6(b)(1) states that when a deadline exists for a party to act, the court "for cause shown may at any time in its discretion with or without motion or notice order the period enlarged if request thereof is made before the expiration of the period originally

prescribed or as extended by previous order”. The current deadline to file the respective documents is tomorrow, October 23, 2025 (ECF No. 84 p. 1 ¶ 2).

WHEREFORE, the Parties respectfully request an enlargement of time through November 6, 2025, to submit the documents required by the Order.

Respectfully Submitted,

Dated: October 22, 2025

/s/Dillon S. Cuthbertson

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